



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUG 23 2007

Andrew D. Herman, Esq.
Brand Law Group
923 Fifteenth Street, N.W.
Washington, D.C. 20005

RE: MUR 5913
International Longshoremen's Association
AFL-CIO Committee on Political Education
ILA-COPE and Robert Gleason, in his official
capacity as treasurer

Dear Mr. Herman:

On August 14, 2007, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondents and the Commission. *See* 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 694-1650

Sincerely,

A handwritten signature in black ink, appearing to read "Ana J. Peña-Wallace", with a long, sweeping horizontal line extending to the right.

Ana J. Peña-Wallace
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
International Longshoremen's Association)
AFL-CIO Committee on Political Education)
ILA-COPE and Robert Gleason, in)
his official capacity as treasurer)

2007 AUG -2 P 3-06

MUR: 5913

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the International Longshoremen's Association AFL-CIO Committee on Political Education ILA-COPE and Robert Gleason, in his official capacity as treasurer ("Respondents"), violated 2 U.S.C. § 434(b).

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The International Longshoremen's Association AFL-CIO Committee on Political Education ILA-COPE, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Robert Gleason is the treasurer of the International Longshoremen's Association AFL-CIO Committee on Political Education ILA-COPE.

3. The treasurer of a political committee must file reports of all receipts and disbursements in accordance with the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 434(a)(1). A committee filing on a quarterly schedule, in a calendar year in which a regularly scheduled general election is held, shall file reports no later than the 15th day after the last day of each calendar quarter (on April 15, July 15 and October 15) and each report shall be complete as of the last day of the calendar quarter for which the report is filed. 2 U.S.C. § 434(a)(4)(A)(i); 11 C.F.R. § 104.5(c)(1)(i). The committee must also file a pre-election report no later than the 12th day before such election, which discloses all receipts and disbursements as of the 20th day before a primary or general election. 2 U.S.C. § 434(a)(4)(A)(ii); 11 C.F.R. § 104.5(c)(1)(ii). Such reports shall also disclose the total amount of all receipts for that reporting period and calendar year. 2 U.S.C. § 434(b)(2).

4. In 2004, Respondents filed amendments to four of its reports to the Commission, disclosing additional receipts totaling \$298,689.06 as follows: on July 15, 2004 the 2004 April Quarterly Report was amended to include \$65,827.21 in additional receipts; on July 15, 2004 the 2004 July Quarterly Report was amended to include \$80,211.62 in additional receipts, on October 15, 2004, the 2004 12-Day Pre-Primary Report was amended to include an additional \$101,782.46 in receipts, and on October 21, 2004, the 2004 October Quarterly Report was amended to include an additional \$50,867.77 in receipts

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V. The International Longshoremen's Association AFL-CIO Committee on Political Education ILA-COPE and Robert Gleason, in his official capacity as treasurer, violated 2 U.S.C. § 434(b) by failing to report \$65,827.21 in receipts in the original 2004 April Quarterly Report, \$80,211.62 in receipts in the original 2004 July Quarterly Report, \$101,782.46 in receipts in the original 2004 12-Day Pre-Primary Report, and \$50,867.77 in receipts in the original 2004 October Quarterly Report.

VI Respondents will cease and desist from violating 2 U.S.C. § 434(b)

VII Respondents will pay a civil penalty to the Federal Election Commission in the amount of Fourteen Thousand Two Hundred and Fifty Dollars (\$14,250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission

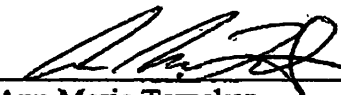
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XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Thornasenia P. Duncan
General Counsel

BY:

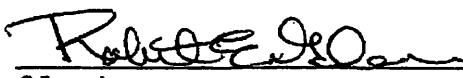

Ann Marie Terzaken
Acting Associate General Counsel
for Enforcement

8/22/07
Date

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

FOR THE RESPONDENTS:


(Name) Secretary-Treasurer
(Position)

8/13/07
Date

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